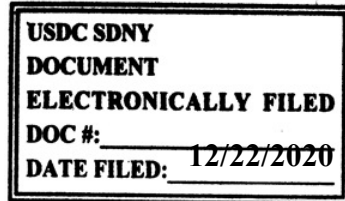


LAW OFFICES  
**GREENBLUM & BERNSTEIN, P.L.C.**  
PATENT, COPYRIGHT AND TRADEMARK MATTERS  
1950 ROLAND CLARKE PLACE  
RESTON, VA 20191-1411  
TEL: (703) 716-1191  
FAX: (703) 716-1180  
EMAIL: [gbpatent@gbpatent.com](mailto:gbpatent@gbpatent.com)  
[www.gbpatent.com](http://www.gbpatent.com)

NEIL F. GREENBLUM  
BRUCE H. BERNSTEIN  
JAMES L. ROWLAND  
ARNOLD TURK Δ  
MICHAEL J. FINK  
STEPHEN M. ROYLANCE ◇  
ROBERT W. MUELLER  
WILLIAM E. LYDDANE  
WILLIAM S. BOSHNICK \*  
PAUL A. BRAIER, Ph.D.  
P. BRANKO PEJIC \*  
DANIEL B. MOON  
BRUCE H. STONER, JR. ◇  
ENOCH PEAVEY  
SEAN C. MYERS-PAYNE, Ph.D.  
JONATHAN R. MILLER \*  
STEVEN B. POLICOFF \*  
BARRY I. HOLLANDER ◇  
GARY V. HARKCOM \*◇  
JAMES P. BONNAMY  
JILL M. BROWNING  
WALTER SCHLAPKOHL, Ph.D.

NAOKO OHASHI \*  
HARRY J. GWINNELL ◇  
JEFFREY H. HANDELSMAN \*  
KENNETH H. SALEN ◇  
SOK K. HONG ◇  
TAI KONDO  
JEFFREY R. BOUSQUET ◇  
GARY M. JACOBS ◇  
JAMES A. GROMADA  
SHAWN A. HAMIDINIA, Ph.D.  
ALI M. IMAM \*  
CHAD E. GORKA  
CHUONG T. NGUYEN \*  
JAMES A. DONEGAN  
CHRISTIAN MANNINO \*

\* ADMITTED TO A BAR  
OTHER THAN VA  
REGISTERED PATENT AGENT  
◇ OF COUNSEL  
Δ SENIOR COUNSEL



December 21, 2020

**VIA ECF**

Hon. Katharine H. Parker  
United States Magistrate Judge, Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 750  
New York, New York 10007

**SO ORDERED:**

**HON. KATHARINE H. PARKER**  
**UNITED STATES MAGISTRATE JUDGE**  
12/22/2020

**Re: *Spectrum Dynamics Medical Limited v. GE*; Case No.: 18-cv-11386 (VSB)**

Dear Magistrate Judge Parker:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule III(d) of your Honor’s Individual Practices in Civil Cases to respectfully request permission to file under seal Plaintiff’s Invalidity Contentions, marked as Exhibit 1 to Plaintiff’s Letter discussing the Invalidity Contentions filed today, December 21, 2020.

Plaintiff requests leave to file Exhibit 1 under seal because it contains information designated as “Highly Confidential-Attorneys’ Eyes Only,” *i.e.*, identification of specific Spectrum trade secrets, under the Stipulated Confidentiality and Protective Order [D.I. 156] that Judge Broderick has previously permitted to be filed under seal in the First Amended Complaint.

Respectfully submitted,

*/s/ Neil F. Greenblum*

Neil F. Greenblum

cc: All counsel of record (via email and ECF)